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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

August 6, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, D.C. 20554

ORIGINAL

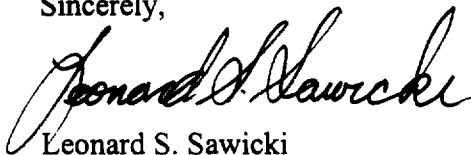
Re: CC Docket No. 97-181: Primary Lines
CC Docket No. 98-104: In the Matter of 1998 Annual Access Tariff Filings

Dear Ms. Salas:

On August 5, Don Sussman, Jim Nedohon and I met with Jay Atkinson, Aaron Goldschmidt, Neil Fried, Tamara Preiss, Rich Lerner and Paula Cech of the Competitive Pricing Division of the Common Carrier Bureau. MCI reviewed the continuing quality problems with LEC PICC information and MCI's efforts to improve that information. MCI also reviewed the disappointing response of most of the LECs to the FCC's order requiring a line indicator in the CARE record. Only one LEC has begun to send this information. MCI also discussed the recent LEC efforts to define primary and non-primary lines on a "by location" basis. MCI pointed out the disparities among the definitions and ambiguities in the individual definitions. The attached information was used during the meeting.

Please add this letter and the enclosed copy to the record of this proceeding.

Sincerely,



Leonard S. Sawicki

Attachment

cc: Mr. Atkinson
Ms. Cech
Mr. Fried
Mr. Goldschmidt
Mr. Lerner
Ms. Preiss

GTE TELEPHONE OPERATING COMPANIES

13. END USER FIA (Cont.d)

13.10 Rate Regulations

- (B) Residence rates, as set forth in 13.11 following, apply to common lines that are subject to residential rates under Telephone Company General and/or local tariffs.

End user residence common line rates and Primary Interexchange Carrier Charge (PICC), as shown in Section 12, are applied as primary or nonprimary.

Until January 1, 1999, the primary residence end user common line and PICC rates will apply to only one line when the customer has more than one line billed on a single account for the same service name at the same service address.

Effective January 1, 1999, the designation of primary and nonprimary will be changed as follows. The primary rate is assessed to the residential subscriber line which is any or all of the following:

- 1) the only line provided at that service address; or,
- 2) the first line installed at that location. Any additional residence exchange lines at the same service location, regardless of the named subscriber, will be assessed the nonprimary rate; or,
- 3) the line designated as the primary by the billed party or parties when multiple exchange lines are ordered at the same time for the same service location.

In most cases only one line at a service location can be classified primary, all others are considered to be nonprimary.

CINCINNATI BELL TELEPHONE COMPANY

2. General Regulation (Cont'd)

2.6 Definitions (Cont'd)

Primary Residence Line/Non Primary Residence Line

The following definition applies through 12/31/98:

Primary Residence Line is the first line of each individual bill at a residence. If a residence receives more than one bill, the first line on each bill is a primary residence line. Separate residences under this definition will be billed as primary residence lines. Non-Primary line is an additional line on a residence bill after the Primary Residence Line.

The following definition applies after 1/1/99:

When an end-user is provided with more than one local residence exchange service at the same service location, only one line will be classified as Primary and all other lines will be considered Non-Primary.

AMERITECH OPERATING COMPANIES

3.8.1 Rate Regulations Concerning Primary Interexchange Carrier Charge (Cont'd)

(A) Primary Residence PICC

A Primary Residence Line is defined as the first local residence exchange service provided to any single service location. The Primary Residence Line may be provided by the Telephone Company under the general and/or local exchange service tariffs. A Primary Residence Line may also be provided on a resold basis by a telecommunications earner other than the Telephone Company. For Primary Residence Lines, the presubscribed interexchange carrier will be billed the Primary Residence PICC rate per presubscribed line, as set forth in 3.9 following. If the end user does not have a presubscribed IC, the PICC will be assessed directly to the end user.

(B) Non-Primary Residence PICC

When an end user is provided with more than one local residence exchange service at the same service location, only one line will be classified as Primary and all other lines are considered to be Non-Primary. One or more of the lines may be provided by the Telephone Company under the general and/or local exchange service tariffs.

3.8.1 Rate Regulations Concerning Primary Interexchange Carrier Charge (Cont'd)

(B) Non-Primary Residence PICC (Cont'd)

One or more lines may also be provided by other telecommunication provider(s) as resold exchange access.

For exchange residence service installed prior to January 1, 1998, the Telephone Company will use existing service records to determine which line is Primary. Current billing records contain Universal Service Order Codes (USOCs) and Field Identifiers (FIDs) that identify non-primary residence lines. If that data are not available, date of installation will be used. The first line installed at a location will be designated as Primary.

For exchange residence service established after January 1, 1998, if the customer orders more than one line at the same service location, the first installed will be Primary. Otherwise, if services are ordered at different times, the date of installation for the same location will be used to designate the Primary line. For Non-Primary Residence lines the presubscribed interexchange carrier will be billed the Non-Primary Residences PICC rate per presubscribed line, as set forth in 3.9 following. For any line that does not have a presubscribed IC, the PICC will be assessed directly to the end user.

U.S. WEST COMMUNICATIONS

4.6 Rate Regulations for EUCL and PICC (Cont'd)

The EUCL and PICC rate applications are described in A. through O., following. The rates are set forth in 4.7 following.

- (A) The EUCL and PICC Residence Subscriber rates, as described in B., C., and I., following, are based on a Primary and Non-Primary basis. The Primary Residence rate is assessed for the first line provided at the residence. Each additional line at the same residence, regardless of the named subscriber, is assessed the Non-Primary Residence rate. If the primary line disconnects, the non-primary line with the greatest length of service becomes the primary line. A residence is defined as a self-contained housing unit that typically contains cooking and sleeping facilities.

4.6 Rate Regulations for EUCL and PICC (Cont'd)

- (B) When a customer is provided local residence exchange service by the Company, the EUCL and PICC Residence Subscriber rates apply for such local residence exchange service on a Primary and Non-Primary basis as set forth in A, preceding.
- (C) When a customer is provided local residence exchange service by the Company and when the local residence exchange service is provided as a multiparty service, the EUCL and PICC Residence Subscriber rates are assessed for each such party on a Primary and Non-Primary basis as set forth in A, preceding.
- (D) When a customer is only a single local business exchange service (excluding PAL Service) by the Company, the EUCL and PICC Single Line Business Subscriber rates apply for each single business service.
- (E) When a customer is provided only a single local business exchange service (excluding PAL Service) by the Company and when the local business exchange service is provided as a multiparty service, the EUCL and PICC Single Line Business Subscriber rates apply for each such party.
- (F) When a customer is provided a single Public Access Line (PAL) by the Company, the EUCL and PICC Multiline Business Subscriber rates apply for each such PAL.
- (G) When a customer is provided more than one local business exchange service in a state by the same Company, the EUCL and PICC Multiline Business Subscriber rates are assessed for each line.
- (H) When a customer is provided DSS by the Company, the EUCL and PICC Multiline Business Subscriber rates apply for every channel (24 channels) on the T-1 facility.

THE NYNEX TELEPHONE COMPANIES

4.6.1 End User Common Line and Presubscribed Interexchange Carrier Charges

The EUCL and PICC Residence Subscriber rate regulations are designated as either Primary or Non-Primary. Until January 1, 1999, the Primary rate is assessed to the residential subscriber line which is any or all of the following: (1) the only line provided at that location; (2) the line designated as primary by the billed party at the point of ordering service; (3) where the billed party

4.6.1 End User Common Line and Presubscribed Interexchange Carrier Charges (Cont'd)

has not designated a line, the first line installed. Any additional lines at the same location for the same billed party will be assessed the Non-Primary rate.

Effective January 1, 1999, the designation of Primary and Non-Primary will be changed as follows: The EUCL and PICC Residence Subscriber rate regulations are designated as either Primary or Non-Primary. The Primary rate is assessed to the residential subscriber line which is any or all of the following: (1) the only line provided at that service location; (2) the line designated as Primary by the billed party or parties at that service location at the point of ordering service; or (3) the first line installed at that location. Any additional residence exchange lines at the same service location, regardless of the named subscriber, will be assessed the Non-Primary rate. If the primary line disconnects, the Non-Primary line with the greatest length of service will become the Primary line. Only one line at a service location can be classified as Primary, and all others are considered to be Non-Primary, whether provided by the Telephone Company under the general and/or local exchange service tariffs or provided by other telecommunications providers as resold exchange access. A service location is defined as the Service Address by the Telephone Company using its billing and service records.

The Telephone Company will use its own service records in the designation of an exchange residence line as Primary or Non-Primary. Such service records typically contain customer Class of Service, Universal Service Order Codes (USOCs), Field Identifiers (FIDs), Service Address and other information which will assist the Telephone Company in the designation.

THE BELL ATLANTIC TELEPHONE COMPANIES

4.1 End User Access Service (Cont'd)

4.1.6 Rate Regulations (Cont'd)

(A) End User Common Line and Presubscribed Interexchange Carrier Charges (Cont'd)

Effective January 1, 1999, the designation of Primary and Non-Primary will be changed as follows:

The EUCL and PICC Residence Subscriber rate regulations are designated as either Primary or Non-Primary. The Primary rate is

assessed to the residential subscriber line which is any or all of the

4.1.6 Rate Regulations (Cont'd)

(A) End User Common Line and Presubscribed Interexchange Carrier Charges (Cont'd)

following: (1) the only line provided at that service location; (2) the line designated as primary by the billed party or parties at that service location at the point of ordering service; or (3) the first line installed at that location. Any additional residence exchange lines at the same service location, regardless of the named subscriber, will be assessed the Non-Primary rate. If the primary line disconnects, the Non-Primary line with the greatest length of service will become the Primary line. Only one line at a service location can be classified as Primary, and all others are considered to be Non-Primary, whether provided by the Telephone Company under the general and/or local exchange service tariffs or provided by other telecommunications providers as resold exchange access. A service location is defined as the Service Address identified by the Telephone Company using its billing and service records.

The Telephone Company will use its own service records in the designation of an exchange residence line as Primary or Non-Primary. Such service records typically contain Customer Class of Service, Universal Service Order Codes (USOCs), Field Identifiers (FIDs), Service Address and other information which will assist the Telephone Company in the designation.

- (B) For each Local Exchange Service provided as remote call forwarding residential service or remote call forwarding business service under the local general services tariffs, the SLC and PICC rates do not apply.

For each local exchange service, other than local exchange service used for administrative purposes, provided to Radio Common Carriers and/or Maritime Radio Common Carriers under the local general services tariffs, the SLC and PICC rates do not apply.

SPRINT LOCAL TELEPHONE COMPANIES

4.6 Rate Regulations for EUCL, LPC and PICC

EUCL per month rates will be billed to the end user of the associated local

exchange service. PICC per-line rates will be billed to the presubscribed interexchange carrier of the associated local exchange service. In the event that

4.6 Rate Regulations for EUCL, LPC and PICC (Cont'd)

the end user chooses not to presubscribe to an interexchange carrier, or has not interexchange carrier selection option, (e.g. individual direct inward dialing (DID) lines), the PICC will be billed to the end user. The rate applications are described in (A) through (P) following.

- (A) The EUCL and PICC residence subscriber rates, as described in (A) and (B) following are assessed on a Primary and Non-Primary basis. Until January 1, 1999, the primary rate is assessed to the residential subscriber line based on the main billing account number. Additional lines billed under the main billing account number will be assessed the non-primary rate.

Effective January 1, 1999, the designation of primary and non-primary will be changed as follows: The EUCL and PICC residence subscriber rate regulations are designated as either primary or non-primary. The primary rate is assessed to the residential subscriber line which is any or all of the following: (1) the only line provided at that service location; or (2) the line designated as primary by the billed party or parties at that service location at the point of ordering the service. In most cases only one line at a service location can be classified as primary, all others are considered to be non-primary.